

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE: TERRORIST ATTACKS ON :
SEPTEMBER 11, 2001 : MDL 03-1570 (GBD)(SN)**

This Document Relates To: All Cases

{PROPOSED} ORDER

Counsel for the *Havlisch* Plaintiffs, having reached a private settlement agreement with the law firms of Motley Rice LLC; Kreindler & Kreindler LLP; Speiser Krause, PC; and Anderson Kill PC, on behalf of their firms and clients, the *Havlisch* Plaintiffs' Renewed Motion for an Order Creating a Common Benefit Fund and Authorizing Certain Disbursements Therefrom (MDL Dkt. No. 4289 & 4291) ("the Motion"), is hereby dismissed with prejudice as against Motley Rice LLC, Kreindler & Kreindler LLP; Speiser Krause, PC; and Anderson Kill PC and their clients.

Counsel for any other party with claims against the Islamic Republic of Iran

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impacted by the Motion may contact counsel for the *Havlish* Plaintiffs if interested in attempting to reach a private settlement of the Motion.

DEC 12 2023

DATE: _____
New York, New York

SO ORDERED.

George B. Daniels
GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE